

UNITED STATES DISTRICT COURT

Northern District of New York

6th Judicial Division

JANE DOE, JOHN DOE.

Plaintiffs

-against-

JONATHAN REES aka GREG ELLIS
aka JOHNATHAN REES aka JONNY REES
aka JACOB LORENZO

Defendant

Case No.3:24-cv-274 (MAD/ML)

**DECLARATION OF
THOMAS D'ANGELO**

**DECLARATION OF THOMAS D'ANGELO IN SUPPORT OF
REPLY FOR DEFAULT JUDGMENT**

I, THOMAS D'ANGELO, declare under penalty of perjury that the foregoing is true and correct:

1. I was the Landlord of Ms. [REDACTED] at [REDACTED] Pitkin Hill Road, Johnson City, NY 13790

2. On or about December 6th, 2022 Mr. Rees, (who told me his name was Greg Ellis) called me and asked if I knew where [REDACTED] was, I replied she's right here with me and my brother Mike at the property. He asked me to pass my phone to her, which I did.

3. On April 19th, 2023 I received a text from Mr. Rees enquiring about the rental property that Ms. [REDACTED] was renting with her family.
4. On August 20th, 2023 I received a text from Mr. Rees with a video and text "This old man turned up at my house today claiming to have been scammed by [REDACTED]."
5. On August 21st, 2023 I received a text from Mr. Rees "Firstly, I'm so sorry I met [REDACTED] and sorry that you ever got introduced to her. Anthony suggested we talk, which I'd like to. Are you available Tommy?"
6. As the Landlord of Ms. [REDACTED], I didn't think it was appropriate to speak with Mr. Rees about my property or my Tenant and why I didn't respond to his text messages.
7. In and around August, 2023 Ms. [REDACTED] told me she was in fear of Mr. Rees and relocated to a new property.
8. My sister Shirley D'Angelo asked me for Ms. [REDACTED]'s new address, which I gave her not knowing at that time that Mr. Rees had also reached out to my sister and befriended her, who based on belief believed Mr. Rees story about Ms. [REDACTED] and asked me to be careful.
9. My sister told me she had spoken with Michael Weisberg after being connected to him by Mr. Rees.
10. Ms. [REDACTED] was upset with me for sharing her address, which I did not understand until Ms. [REDACTED] showed me a website with her address publicly advertised. Ms. [REDACTED] told me she was afraid of what Mr. Rees and his friends would do and needed to leave immediately. I helped move her, her three children and her dog with some of their belongings to the Hilton Hotel in Vestal, NY. My sister asked me for Ms. [REDACTED]'s whereabouts, which based on belief was requested by Mr. Rees. I did not disclose her new location to anyone now understanding the gravity of Mr. Rees pursuit of Ms. [REDACTED].

Executed on January 4, 2025.

Thomas D'Angelo

Thomas D'Angelo

JEREMIAH BENJAMIN BALDWIN
Notary Public - State of New York
No. 01BA6373817
Qualified in Tioga County
My Commission Expires April 16, 2026

Jeremiah Baldwin

